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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ARTHUR SHERIDAN, an individual,
and BARBARA SHERIDAN, an
individual, individually and on behalf of
all those similarly situated,

Plaintiffs,

v.

iHEARTMEDIA, INC., a Delaware
corporation,
Defendants.

Civil Action No.
2:15-cv-07574 (WHW) (CLW)

Honorable William H. Walls

**NOTICE OF MOTION
TO DISMISS**

ORAL ARGUMENT REQUESTED

Motion Day: February 1, 2016

TO: THE CLERK OF COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on February 1, 2016, at 9:00 a.m. or as soon thereafter as counsel may be heard, Defendant iHeartMedia, Inc. (“iHeartMedia”) will move, by and through the undersigned attorneys, before the Honorable William H. Walls, U.S.D.J., for an order pursuant to Rule 12(b)(6), dismissing the Class Action Complaint in the above-captioned action with prejudice.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, iHeartMedia will rely upon the accompanying Memorandum of Law, Declaration of Kevin M. McDonough, and proposed Order, as well as all pleadings and other documents filed with the Court in this matter.

Oral argument is requested.

Dated: December 29, 2015

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Kevin M. McDonough
Kevin M. McDonough

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